BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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Mailing Online Service

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Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS: LINDA WILCOX (OCA/USPS-T7-1-7) (July 31, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette

Acting Director

Office of the Consumer Advocate

Shelley A. Dreifuss
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Attorney

OCA/USPS-T7-1. Please refer to page 2 of your testimony. You state that you can now get your entire mailing completed in about half an hour. Please describe the steps you take during that half-hour to prepare and complete your transaction with the Postal Service.

OCA/USPS-T7-2. How many months has it been that you have been mailing the Café calendar using the Mailing Online service?

OCA/USPS-T7-3. You state at page 2 of your testimony that the Mailing Online service has "caused me to purge my mailing list of bad addresses."

- a. Does the Postal Service require you to purge your mailing list of bad addresses?
- b. How were you able to determine that the addresses were bad? Please explain.
- Wouldn't you have saved money by purging your mailing list of bad addresses
 even if you hadn't started using Mailing Online? Please explain.

OCA/USPS-T7-4. You also state at page 2 that you can have your lists cleaned as part of the Mailing Online program.

- a. Does the Postal Service "clean" your lists?
- b. If so, does the Postal Service charge a fee for cleaning your lists? If a fee is charged, what is the fee?
- c. What does the Postal Service do to clean your lists, i.e., how have your lists been improved after the service has been provided?
- d. Can you obtain the "cleaning" service without participating in Mailing Online?

OCA/USPS-T7-5. At page 3, you mention using e-mail more often.

- Do you transmit your calendar and mailing list to the Postal Service by means of e-mail?
- b. If so, do you attach the electronic files for the calendar and the mailing list to an e-mail message? Do you paste the electronic calendar information and electronic mailing list information into an e-mail message? Please explain.
- c. Have you found that there is any incompatibility in the software you use to generate the calendar and mailing list and the software used by the Postal Service to receive and produce your mail? Please explain.
- d. Do you upload the electronic files for the calendar and the mailing lists to a
 Postal Service site on the internet? Please explain.

OCA/USPS-T7-6. How did you learn to use Mailing Online?

- a. Did a Postal Service representative come to your café to work with you?
- b. Did you have consultations over the telephone?
- c. Were you given written materials explaining how to use the service? If so, provide copies of any written explanatory materials.
- d. How long did it take you to become proficient in using Mailing Online?
- e. Please give a detailed explanation in responding to the 5 questions comprising this interrogatory.

OCA/USPS-T7-7. You state at page 1 that, prior to using Mailing Online, preparing your newsletter for mailing was about an 8-hour effort. Did you ever consider having an

outside entity prepare the mailing so as to avoid the drain on your time? If you did, why did you rule out that alternative?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

Shelley S. Dreifuss

Attorney

Washington, D.C. 20268-0001 July 31, 1998